

The Honorable Judge John C. Coughenour

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON; STATE OF  
ARIZONA; STATE OF ILLINOIS; and  
STATE OF OREGON,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity  
as President of the United States; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; KRISTI NOEM, in her official  
capacity as Secretary of Homeland Security;  
U.S. SOCIAL SECURITY  
ADMINISTRATION; MICHELLE KING,  
in her official capacity as Acting  
Commissioner of the Social Security  
Administration; U.S. DEPARTMENT OF  
STATE; MARCO RUBIO, in his official  
capacity as Secretary of State; U.S.  
DEPARTMENT OF HEALTH AND  
HUMAN SERVICES; DOROTHY FINK,  
in her official capacity as Acting Secretary  
of Health and Human Services; U.S.  
DEPARTMENT OF JUSTICE; JAMES  
MCHENRY, in his official capacity as  
Acting Attorney General; U.S.  
DEPARTMENT OF AGRICULTURE;  
GARY WASHINGTON, in his official  
capacity as Acting Secretary of Agriculture;  
and the UNITED STATES OF AMERICA,

Defendants.

NO. 2:25-cv-00127-JCC

INDEX OF DECLARATIONS IN  
SUPPORT OF PLAINTIFF  
STATES' MOTION FOR  
PRELIMINARY INJUNCTION

**Declarations in Support of Plaintiff States' Motion for Preliminary Injunction**

| <b>ECF No.</b> | <b>Name</b>          | <b>Title</b>  |
|----------------|----------------------|---|
| <b>12</b>      | Lane Polozola        | Managing Assistant Attorney General<br>Wing Luke Civil Rights Division<br>Washington State Office of the Attorney General |
| <b>13</b>      | Dr. Shelley Lapkoff  | Senior Demographer<br>National Demographics Corporation   |
| <b>14</b>      | Dr. Charissa Fotinos | State Medicaid Director<br>Washington State Health Care Authority   |
| <b>15</b>      | Jenny Heddin         | Deputy Secretary—Chief of Staff<br>Washington State Department of Children,<br>Youth and Families                         |
| <b>16</b>      | Katherine Hutchinson | State Registrar and Office Director<br>Center for Health Statistics<br>Washington Department of Health                    |
| <b>17</b>      | Brian Reed           | Service Line Administrator of Women's and<br>Children's Services<br>UW Medicine   |
| <b>18</b>      | Dr. Tom K. Wong      | Associate Professor<br>University of California, San Diego (UCSD)   |
| <b>19</b>      | David C. Baluarte    | Professor of Law and Senior Associate Dean for<br>Academic Affairs<br>CUNY School of Law                                  |
| <b>20</b>      | Dr. Caitlin Patler   | Associate Professor of Public Policy<br>Goldman School of Public Policy<br>University of California, Berkeley             |

| <b>ECF No.</b> | <b>Name</b>          | <b>Title</b>   |
|----------------|----------------------|--|
| <b>21</b>      | Sarah K. Peterson    | Director of Washington's Office of Refugee and Immigrant Assistance<br>Economic Services Administration<br>Washington Department of Social and Health Services |
| <b>22</b>      | Magaly Solis Chavez  | Executive Director<br>La Casa Hogar  |
| <b>24</b>      | Krystal Colburn      | Chief Reporting Officer and Assistant State Registrar<br>Arizona Department of Health Services   |
| <b>25</b>      | Jeffrey Tegen        | Assistant Director<br>Division of Business and Finance<br>Arizona Health Care Cost Containment System Administration   |
| <b>26</b>      | Nadine O'Leary       | Deputy State Registrar<br>Division of Vital Records<br>Illinois Department of Public Health  |
| <b>27</b>      | Jennifer A. Woodward | State Registrar<br>Oregon Health Authority   |
| <b>65</b>      | Aprille Flint-Gerner | Director<br>Child Welfare Division<br>Oregon Department of Human Services  |
| <b>66</b>      | Heidi E. Mueller     | Director<br>Illinois Department of Children and Family Services  |
| <b>67</b>      | Mozhdeh Oskouian     | Deputy Director<br>Northwest Immigrant Rights Project (NWIRP)  |

DATED this 27th day of January 2025.

NICHOLAS W. BROWN  
Attorney General

s/ Lane M. Polozola

COLLEEN M. MELODY, WSBA #42275  
Civil Rights Division Chief  
LANE POLOZOLA, WSBA #50138  
DANIEL J. JEON, WSBA #58087  
ALYSON DIMMITT GNAM, WSBA #48143  
Assistant Attorneys General  
Wing Luke Civil Rights Division  
Office of the Washington State Attorney General  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104-3188  
(206) 464-7744  
colleen.melody@atg.wa.gov  
lane.polozola@atg.wa.gov  
daniel.jeon@atg.wa.gov  
alyson.dimmittgnam@atg.wa.gov

*Attorneys for Plaintiff State of Washington*

KRIS MAYES  
*Attorney General of Arizona*

s/ Joshua Bendor

Joshua D. Bendor (AZ No. 031908)\*  
Luci D. Davis (AZ No. 035347)\*  
Gabriela Monico Nunez (AZ No. 039652)\*  
Office of the Arizona Attorney General  
Firm State Bar No. 14000  
2005 N. Central Ave.  
Phoenix, AZ 85004  
(602) 542-3333  
Joshua.Bendor@azag.gov  
Luci.Davis@azag.gov  
Gabriela.MonicoNunez@azag.gov  
ACL@azag.gov

*\*Pro hac vice*  
*Attorneys for Plaintiff State of Arizona*

KWAME RAOUL  
*Attorney General, State of Illinois*

s/ Rebekah Newman

REBEKAH NEWMAN, ARDC #6327372\*  
Assistant Attorney General  
Special Litigation Bureau

Office of the Illinois Attorney General  
115 South LaSalle St., Floor 35  
Chicago, IL 60603  
Tel. (773) 590-6961  
rebekah.newman@ilag.gov

*\*Pro hac vice  
Attorneys for Plaintiff State of Illinois*

DAN RAYFIELD  
*Attorney General, State of Oregon*

/s/ Carla A. Scott  
CARLA A. SCOTT, WSBA #39947  
THOMAS H. CASTELLI, OSB #226448\*  
Senior Assistant Attorneys General  
Oregon Department of Justice  
100 SW Market Street  
Portland, OR 97201  
(971) 673-1880  
Carla.A.Scott@doj.oregon.gov  
Thomas.Castelli@doj.oregon.gov

*\*Pro hac vice  
Attorneys for Plaintiff State of Oregon*